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Attorney for Justin Lee Tripp

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUSTIN LEE TRIPP,

Defendant.

CASE NO.: 2:20-cr-00237-APG-DJA-1

**STIPULATION AND PROPOSED ORDER
TO EXTEND DEADLINE TO
SUPPLEMENT MOTION FOR
COMPASSIONATE RELEASE
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by Jacqueline Tirinnanzi, counsel for Justin Lee Tripp, and Kimberly Frayn., counsel for the United States of America, that the deadline on which defendant must file his supplement in support of compassionate release ordered due on July 21, 2022, (ECF No. 109), be extended 30 days to date on or before August 20, 2022.

This stipulation is entered into based upon the following reasons:

1. On March 17, 2022, defendant filed a pro se motion for compassionate release. ECF No. 102.
2. Counsel for defendant was appointed to Mr. Tripp to supplement his motion for compassionate release (or file notice that no supplement is needed) on April 5, 2022.
3. This Court issued an order requiring that counsel must either file a supplement to the motion for compassionate release (or file a notice that no supplement is needed) on or

1 before June 6, 2022. (ECF No. 107)

- 2 4. Counsel was having difficulty reaching Mr. Tripp for weeks at FCI Herlong where he
- 3 has been housed. Due to an ongoing lockdown, counsel for defendant was told the
- 4 soonest she would reach Mr. Tripp for a phone call was the week of June 6-10, 2022.
- 5 Counsel required the opportunity to speak with defendant before she could
- 6 meaningfully determine whether a supplement in support of compassionate release was
- 7 appropriate (necessitating the first extension). Counsel has since been in contact with
- 8 Mr. Tripp.
- 9
- 10 5. Mr. Tripp recently informed counsel of circumstances related to his health condition
- 11 occurring through June 2022. Counsel obtained the most recent documentation
- 12 expected to reflect this additional development as of July 18, 2022, but requires
- 13 additional time to evaluate the abovementioned issue in relation to the supplement,
- 14 including to confer with defendant.
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- 16 6. Counsel agree that United States of America will have 14 days to submit their response.
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- 18 7. The parties agree to the extension of time.
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- 20 8. This is the second request for extension of time.

21 Dated this 21st day of July 2022.

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/s/ Jacqueline Tirinnanzi
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 vs.

7 JUSTIN LEE TRIPP,

8 Defendant.
9

CASE NO.: 2:20-cr-00237-APG-DJA-1

ORDER

10 Based upon the stipulation of counsel, and good appearing, IT IS HEREBY ORDERED
11 that defendant's supplement in support of compassionate release shall be due on or before
12 August 20, 2022.
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19 DATED: July 27, 2022
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23 THE HONORABLE ANDREW P. GORDON
24 UNITED STATES DISTRICT JUDGE
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